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9 **Attorneys for Defendants**

10 **AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.**
11 **AMERICAN EXPRESS CENTURION BANK and AMERICAN**
12 **EXPRESS BANK FSB**

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 **DAVID J. LEE, and DANIEL R. LLOYD,)**
16 **as individuals and, on behalf of others)**
17 **similarly situated,)**

18 **Plaintiffs,)**

19 **vs.)**

20 **AMERICAN EXPRESS TRAVEL)**
21 **RELATED SERVICES, INC., a New York)**
22 **corporation, AMERICAN EXPRESS)**
23 **CENTURION BANK, a Utah corporation,)**
24 **AMERICAN EXPRESS BANK, FSB, a)**
25 **Utah corporation, and DOES 1, through)**
26 **100, inclusive,)**

27 **Defendants.)**

Case No.: C-07-4765 CRB

CLASS ACTION

(Assigned to the Honorable Charles R. Breyer)

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

Action filed: September 17, 2007

1 WHEREAS, this action was filed on September 17, 2007;

2 WHEREAS, Defendants AMERICAN EXPRESS TRAVEL RELATED SERVICES,
3 INC., AMERICAN EXPRESS CENTURION BANK, and AMERICAN EXPRESS BANK,
4 FSB, were served with the Complaint on or about September 21, 2007;

5 WHEREAS, Plaintiffs have agreed that the time for Defendants to answer or file a
6 motion to dismiss in response to the Plaintiffs' Complaint shall be extended to and including
7 Thursday, October 25, 2007, pursuant to Local Rule 6-1(a);

8 WHEREAS, Defendants' time to respond has not previously been extended, and;

9 WHEREAS, this Stipulation has been made in good faith and without purpose of delay;

10 IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through
11 their respective counsel of record, that the time for the Defendants to either answer or file their
12 motions to dismiss in response to the Complaint shall be extended to and including Thursday,
13 October 25, 2007.

14 Defendants shall reserve all defenses to the Complaint, and may respond by either
15 answer or motion to dismiss, to the extent allowable by law.

16 Dated: October 6, 2007

17 STROOCK & STROOCK & LAVAN, LLP
18 JULIA B. STRICKLAND
19 STEPHEN J. NEWMAN

20
21 By: 

22 Stephen J. Newman

23 Attorney for Defendants

24 AMERICAN EXPRESS TRAVEL RELATED
25 SERVICES COMPANY, INC., AMERICAN
EXPRESS CENTURION BANK and
AMERICAN EXPRESS BANK FSB

1 Dated: October 4th, 2007

HALE & ASSOCIATES
MATTHEW S. HALE

By: 

Matthew S. Hale

Attorney for Plaintiffs

DAVID J. LEE and DANIEL R. LLOYD